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March 13, 2015

BY ECF

Honorable Thomas P. Griesa
United States District Judge
U.S. District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Prevezon Holdings, Ltd., et al.,*
13 Civ. 6326 (TPG)

Dear Judge Griesa:

We are new counsel to William Browder, who is not a party in the above captioned matter. Pursuant to the Court's approval issued yesterday, we have entered an appearance for Mr. Browder.

We write pursuant to the Court's March 10, 2015 order requiring the parties and Mr. Browder to confer regarding the non-party subpoena issued by Defendants on February 3, 2015 to Mr. Browder (the "New York Subpoena") and to report to the Court if scope or confidentiality issues remain in dispute.

We have conferred with each of the parties as directed by the Court. There are no disputes to report to the Court at this time. Mr. Browder intends to begin producing documents pursuant to the New York Subpoena on a rolling basis as soon as practicable, likely starting next week. Mr. Browder also intends to make himself available for deposition on April 15, 2015 or on a mutually convenient date if all parties agree on a different date.

Counsel for Browder will work to finalize confidentiality agreements with the parties next week.

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Counsel for Defendants, who issued the subpoena, and we have agreed to confer again at 12:30 p.m. (New York) / 4:30 p.m. (London) on Friday, March 20, 2015 to discuss in greater detail any issues relating to the New York Subpoena that arise as particular documents are collected and produced. We expect to continue such conferences regularly while the subpoena is outstanding. If disagreements arise in the future regarding scope, confidentiality, or otherwise over particular items relating to the New York Subpoena, the parties will attempt privately to resolve them before troubling the Court.

Respectfully submitted,

/s/

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cc: Counsel of Record (by ECF)